## DRAFT #1 -- 18 July 1994

## Basic Points in Response to Article by Benowitz and Henningfield

- 1. The authors base their views and recommendations on a fallacious premise: that all smokers other than those who smoke fewer than six cigarettes per day are "addicted" to nicotine. From that premise, they seek to prohibit all forms of smoking other than those that the authors deem to be "non-addictive" smoking.
- 2. The authors do not cite any studies that show a correlation between nicotine yields (or blood levels) and the ability to quit smoking. To the contrary, the authors recognize that a "threshold level for nicotine addiction is a *theoretical* concept" and state that whether "restricting levels of nicotine would prevent addiction needs to be verified empirically." (p. 124). Indeed, empirical studies have generally shown that neither withdrawal nor preabstinence nicotine or cotinine levels in the blood predict a smoker's ability to quit smoking.
- 3. Smoking is a highly complex behavior. Many people are able to quit easily; others may find it difficult to give up the pleasures of smoking. Nevertheless, it is far from clear that the difficulty that some people may have in quitting is related to, or can be empirically correlated with, nicotine levels. For example, there are no reported differences in the quit ratios among smokers of different types of cigarettes (e.g., high versus low yield).
- 4. Cigarette manufacturers currently offer a full range of products, including ultra low yield cigarettes with reported nicotine yields that are *below* the level that Benowitz and Henningfield propose. The authors, however, would substitute their judgment for consumer choice and would prohibit any cigarettes with nicotine yields higher than .17 mg.
- 5. The authors recognize that the measures they describe "may seem drastic to some." (p. 125)

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- 6. The article does not report on the findings of an empirical study, but is simply an essay, which has not been peer reviewed.
- 7. Analogous to the authors' proposal would be limits on alcohol or caffeine content in beverages or maximum fuel consumption for cars.